

2003 (Anticipates effective date of the revision to be no later than Sept. 2001)

(1) Report emissions to AEI (calendar year 2002)

2004

(2) One time demonstration of compliance (all applicable sources¹)

- ◆ Compliance certification statement needed by pollutant ← "Allowables do not exceed AAC"
- ◆ Acceptable methods
 - Dispersion modeling
 - Stack measurements
 - Material Safety Data Sheets
 - Engineering calculations← Simplified process for existing/non-changed BACT/LAER source "check-off box"

Ability to get limited extensions would be available

Could be timed/included with annual emission reporting

Cases where
action needs to be
taken

Non-carcinogens:

Adequate information to describe compliance would be submitted. Acceptable submittals would serve as a shield until subsequent permit review and as a compliance tool. Source would have to be in compliance with plan. (*examples: production or content caps, product substitution, stack modifications, installation of controls*)

New BACT/LAER reviews:

Propose to target this limited group of sources for review (permit assignment, renewal, reopening)

- No prior review of compound
- Risk > 10-5
- Non-exempt
- Non-MACT

2004 & Beyond → Permit application or revision

(3) FOPs/FESOPs

Existing
forms

Calculations
Product formulations
Stack test, etc

If significant changes, then submit permit modification

SOPs: detailed info when permit application being reviewed (normal process)

¹ "all applicable sources" is yet to be defined. Different scenarios are being developed.